

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Negotiated Channel Arrangement for	)	
Second Round Digital Channel Election	)	MM Docket No. 03-15
	)	
Station KFTY(TV), Santa Rosa, CA	)	File No. BSRECT-20051028ACZ
Station KRON-TV, San Francisco, CA	)	File No. BSRECT-20051031AAW
Station KTFK-TV, Stockton, CA	)	File No. BSRECT-20051031ADV
Station KTVU(TV), Oakland, CA	)	File No. BSRECT-20051031ABN
Station KTNC-TV, Concord, CA	)	File No. BSRECT-20051031ABG
Station KVIE(TV), Sacramento, CA	)	File No. BSRECT-20051020AAA
	)	
To: Office of the Secretary		
Attn: Chief, Media Bureau		

**REPLY COMMENTS OF  
ACKERLEY BROADCASTING OPERATIONS, LLC**

Ackerley Broadcasting Operations, LLC ("Ackerley"), the licensee of KFTY, Santa Rosa, California,<sup>1</sup> hereby responds to the comments ("Comments") of Rural California Broadcasting Corporation ("RCBC") and the objection ("Objection") of Broadland Properties, Inc. ("Broadland") with respect to the above captioned Negotiated Channel Election Arrangement ("NCA").

**BACKGROUND**

Station KFTY operates on NTSC channel 50 and out-of-core DTV channel 54. Due to the proximity of a DTV channel 50 allotted to a station in San Jose, California, Ackerley opted to "release" KFTY's channel 50 allotment in the first round of channel

---

<sup>1</sup> Ackerley Broadcasting Operations, LLC recently became the licensee of KFTY pursuant to an FCC-authorized *pro forma* assignment of the station's license from Ackerley Media Group, Inc. See FCC File No. BALCT-20051104ABE.

elections and instead seek a more suitable post-transition DTV channel in the second round. Unfortunately, the Northern California area in which KFTY-DT operates is one of the most spectrum-congested areas in the country. Given the extremely limited number of channels available in the Northern California area, KFTY-DT cooperated with the five other second round electors captioned above to develop a negotiated channel plan that would avoid conflicts and provide for the most efficient and effective use of the limited spectrum available.

Aside from channel 14 and the undesirable low-band VHF channels 2-6, no channel is available for KFTY-DT to use at its current site that would satisfy the FCC's limit of 0.1% new interference, allow the station to replicate its "certified" DTV service area and also meet Ackerley's desire to have KFTY-DT receive less than 10% interference post-transition.<sup>2</sup> Channel 14 is also the only suitable channel available for use from the current sites of two other stations party to the NCA: KTFK-DT, Stockton, California and KTNC-DT, Concord, California. Accordingly, to prevent an irreconcilable dispute over the use of channel 14, KFTY-DT and KTFK-DT agreed in the NCA to elect channels 22 and 26, respectively, and let KTNC-DT use channel 14. In selecting channels 22 and 26, KFTY-DT and KTFK-DT recognized that their use of such channels would require modifications to their respective allotment reference sites, but determined that these channels were the best options available for the stations to limit interference and provide adequate service to their respective coverage areas.

---

<sup>2</sup> In its Report and Order in the *Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, 19 FCC Rcd 18,279 (2004), the Commission specifically acknowledged the unsuitability and undesirability of low-band VHF channels. Low-band VHF channel reception issues include interference from power lines, man-made impulse noise and ionospheric propagation, which are more pronounced with digital reception because digital television sets may lose or freeze their pictures as a result of such interference.

Accordingly, on November 30, 2005, KFTY-DT submitted an FCC Form 385 (File No. BSRCT-20051130AJX) specifying post-transition DTV facilities on channel 22 that would be collocated on Sonoma Mountain with the adjacent channel 23 post-transition DTV facilities of KRCB, Cotati, California. By collocating their post-transition DTV facilities as specified in the Form 385, stations KFTY-DT and KRCB-DT would not suffer any interference to their respective operations.

### **REPLY TO RCBC's COMMENTS**

RCBC does not object to KFTY-DT's channel election or, as its Comments state, "the *concept* of KFTY-DT's collocation with KRCB-DT." Rather, RCBC's Comments simply note that Ackerley currently does not have a collocation agreement with RCBC or final approval from the Sonoma Mountain site owners and state that, in the event Ackerley does not obtain such agreement and/or approval, the FCC should not entertain any different proposal by KFTY-DT on its elected channel 22 that would fail to provide complete protection to KRCB-DT.

Ackerley fully acknowledges and appreciates RCBC's concern. Indeed, Ackerley regrets that it did not contact RCBC to discuss the specifics of KFTY-DT's collocation plan prior to the submission of its Form 385. Nevertheless, Ackerley has now made contact with RCBC and is committed to working out a mutually acceptable arrangement. In addition, Ackerley has met with the real estate manager for Sonoma County, which administers the Sonoma Mountain tower site, and has been assured of the County's willingness to work with Ackerley.

More importantly, Ackerley understands and acknowledges that if it cannot collocate KFTY-DT's proposed channel 22 facilities with KRCB-DT, for any reason

whatsoever, then KFTY-DT will have no recourse other than to modify its facilities to avoid interference with KRCB-DT. Given the extraordinarily limited channel options available to it, however, Ackerley is willing to accept the risk. Accordingly, under the circumstances, the Commission should not have any reservations granting KFTY-DT's channel 22 proposal.

### **REPLY TO BROADLAND'S OBJECTION**

Broadland claims that KFTY-DT's channel 22 proposal must be rejected because it would cause 38.1% interference to Class A station KAXT-CA, channel 22, Santa Clara and San Jose, California, which is licensed to Broadland. The interference level cited by Broadland is a bit misleading, however. The attached Technical Statement of duTreil, Lundin & Rackley, Inc., Consulting Engineers, shows that KAXT-CA currently receives interference to 29.5% of the population within its analog service area. Station KFTY-DT's channel 22 proposal would result in KAXT-CA receiving interference to 39.5% of its analog service population – or only 10% more than it currently receives.

Ackerley regrets that the scarcity of television spectrum in the Northern California area necessitates KFTY-DT's channel 22 proposal and the consequent interference to KAXT-CA's analog operations, but submits that such interference will, at worst, be only temporary. Station KAXT-CA must eventually convert to digital-only operations by either "flash-cutting" from analog to digital service on its existing channel 22 allotment or, by the digital conversion deadline eventually set for Class A low power television stations, ceasing analog operations on channel 22 and continuing its digital operations on a separate DTV "companion" channel. As the attached Technical Statement demonstrates, if KAXT-CA operates digitally on channel 22 with facilities that

replicate its existing analog service area, KFTY-DT's proposed channel 22 operation would result in KAXT-CA receiving interference to only 25.5% of the population within its service area -- a 4% decrease in the amount of interference KAXT-CA is currently receiving. It must be emphasized that KFTY-DT does not intend to (and indeed cannot) commence digital operations on channel 22 until the end of the DTV transition.

Accordingly, at worst, KAXT-CA's analog facilities would receive increased interference from KFTY-DT for only that temporary period of time between the date that the DTV transition ends for full-service stations and the date that KAXT-CA converts to digital operations.<sup>3</sup>

Should this "worst case" temporary interference scenario occur, Ackerley submits that it is acceptable because it falls within an exception to the Community Broadcasters Protection Act of 1999 ("CBPA")<sup>4</sup> which otherwise affords qualified Class A stations an interference protection priority over modification proposals submitted by full-service DTV stations after May 1, 2000. The exception, contained in Section 336(f)(1)(D) of the CBPA, provides that Class A stations are not entitled to interference protection where "technical problems arise requiring an engineering solution to a full-power station's allotted parameters or channel assignment in the digital television Table of Allotments."<sup>5</sup>

In such cases, the CBPA provides that "the Commission shall make such modifications as

---

<sup>3</sup> As shown in the attached Technical Statement, alternative channels are available for KAXT-CA to operate in analog mode in a post-transition environment which would allow KAXT-CA to dramatically reduce the amount of interference currently received by the station. Specifically, KAXT-CA could operate on either channel 20 or channel 42 and reduce its interference received to less than 2%.

<sup>4</sup> Community Broadcasters Protection Act of 1999, Pub. L. No. 106-113, *codified at* 47 U.S.C. § 336(f).

<sup>5</sup> 47 U.S.C. § 336(f)(1)(D).

necessary...to ensure replication of the full-power digital television applicant's service area....”<sup>6</sup>

The technical problem faced by Ackerley and its NCA counterparts is the fact that there simply is not enough interference-free spectrum available in Northern California to allow each of them to provide adequate DTV coverage to their respective service areas. The channel plan proposed by the NCA represents a global solution that will allow each of the six stations involved to secure post-transition DTV channels that minimize service area losses. Although Ackerley regrets that KAXT-CA's analog operations may possibly receive a temporary increase in interference as a result of KFTY-DT's channel 22 proposal, such proposal is necessary to facilitate an efficient use of scarce spectrum by multiple full-service DTV stations in the Northern California area and is therefore acceptable under the CBPA.

If the Commission believes otherwise, however, Ackerley respectfully requests that the agency not reject KFTY-DT's channel 22 proposal out-of-hand but allow Ackerley an opportunity to resolve the interference with KAXT-CA in the same manner as would be afforded a second round elector not party to an NCA (*i.e.*, by submission of an FCC Form 385/Digital Channel Election Form Second Round Conflict Decision). In this regard, Ackerley asks that it be given 60 days to decide whether it can resolve the interference through a conflict resolution agreement with KAXT-CA or, if not, to decide whether KFTY-DT will change its election to its contingent second round channel election or give it up and elect to participate in the third round of elections.

---

<sup>6</sup> *Id.*

**CONCLUSION**

For the reasons stated above, Ackerley respectfully requests that the Commission approve the NCA and assign channel 22 to KFTY-DT for its post-transition digital television operations or, at a minimum, allow Ackerley 60 days to resolve the interference situation with KAXT-CA.

Respectfully submitted,

**ACKERLEY BROADCASTING  
OPERATIONS, LLC**

By: 

John M. Burgett

WILEY REIN & FIELDING LLP  
1776 K Street, N.W.  
Washington, DC 20006  
202-719-7000

Its Attorneys

December 14, 2005

TECHNICAL STATEMENT  
RESPONSE TO  
ROUND II POST-TRANSITION CHANNEL SELECTION OBJECTION  
KFTY(TV) SANTA ROSA, CALIFORNIA

Technical Statement

This technical statement was prepared on behalf of television station KFTY(TV) assigned to Santa Rosa, California. KFTY is assigned on NTSC Channel 50 and DTV Channel 54. As KFTY has only one in core channel, Channel 50, the station elected in Round I to release its in-core channel and proceed directly to Round II for its post-transition digital channel. KFTY(TV) has entered into a Negotiated Channel Election Arrangement seeking Channel 22 for its final DTV channel at a modified allotment reference site.

KFTY-DT on Channel 50

As noted above, KFTY(TV) released its in-core NTSC Channel 50 during the Round I election. This was due to the extreme co-channel short-spacing already existing between KFTY and KTEH.<sup>1</sup> KTEH, assigned to San Jose, is allocated DTV Channel 50 and NTSC Channel 54 [the opposite channel relationship as KFTY] and selected and "locked-in"

---

<sup>1</sup> It is known that the Commission is not considering distance separations in the creation of the post transition Table of Allotments, however, these distance calculations are still useful in characterizing the possible interference and allotment modification flexibility between full-service stations.

its existing Channel 50 DTV allotment during Round I. The separation distance between KTEH and KFTY is 147 kilometers (92 miles) - and both stations are located within the same DMA. From Section 73.623 of the Commission's Rules, new DTV allotments are required to have a minimum co-channel separation distance of 223.7 kilometers in TV Zone II. Therefore, rather than have this permanent co-channel short-spacing of 76.7 kilometers (48 miles) between KFTY and KTEH, KFTY wished to elect a channel with a greater separation distance post transition to any nearby co-channel full-service stations.

Indeed, the proposed Channel 22 facilities satisfies all the minimum distance separation distances to other full-service digital stations except for a minor first-adjacent short-spacing to KMAX-DT on Channel 21. The actual separation distance between the proposed KFTY and KMAX-DT is 95.6 kilometers; from Section 73.623 of the Commission's Rules, new DTV allotments are required to have a minimum first-adjacent channel separation distance of 110 kilometers. Therefore, this is only a proposed short-spacing of 14.4 kilometers.

Impact on KAXT-CA on Channel 22 assigned to Santa Clara, CA

Contained in Figure 1 are the OET-69 analyses to KAXT-CA on Channel 22 from the proposed KFTY NCA facility. As can be seen, KAXT-CA in its present analog mode receives interference to 450,060 persons, or 29.5 percent of the KAXT-CA baseline, from two authorized NTSC stations, without considering KFTY.<sup>2</sup> If KFTY on Channel 22 is

---

<sup>2</sup> It is believed that the difference between the KAXT-CA Opposition interference values and the herein interference values the cell size used in the OET-69 analysis.

considered, the interference increases to 602,038 persons, or 39.5 percent of the KAXT-CA analog baseline. Therefore, KFTY would increase the interference to KAXT-CA by 151,978 persons, or 10 percent of the KAXT-CA analog baseline.

However, if KAXT-CA is considered operating in digital mode with replication facilities, the interference received to KAXT-CA actually decreases.<sup>3</sup> As shown in Sheet 3 of Figure 1, KAXT-CA on Channel 22 operating in digital mode received interference to 386,409 persons, or 25.5 percent of the KAXT-CA digital baseline. Therefore, KFTY would decrease the interference to KAXT-CA operating in digital model by 151,978 persons, or 4 percent of the KAXT-CA digital baseline.

#### Alternate Post Transition Channels for KAXT-CA

It appears that at least two UHF channels are available for KAXT-CA operating in analog mode in the post transition environment, Channels 20 and 42. With the same analog power as now licensed, KAXT-CA could operate on either Channel 20 or 42 and not cause interference to any pertinent station calculated pursuant to OET-69 as shown in Figure 2.

---

<sup>3</sup> To determine the KAXT-CA digital replication facilities, an antenna pattern envelope was calculated to maintain the digital station's protected contour at approximately the same distance as its associated analog protected contour. This is a similar procedure as was done by the Commission creating a full-service station's digital replicated contour.

Furthermore, the interference received to KAXT-CA on either of these channels is less than 2 percent of its baseline contour.

Charles A. Cooper

December 13, 2005

du Treil, Lundin & Rackley, Inc.  
201 Fletcher Avenue  
Sarasota, Florida 34237  
(941) 329-6000

TECHNICAL STATEMENT  
RESPONSE TO  
ROUND II POST-TRANSITION CHANNEL SELECTION OBJECTION  
KFTY(TV) SANTA ROSA, CALIFORNIA

OET-69 Analysis to KAXT-CA [Analog]  
Interference Received During Transition

KAXT-CA BLTTA -20031010AAT SANTA CLARA-SAN JOSE CA US  
Channel 22 ERP 56. kW HAAT 00999 m RCAMSL 00344 m  
Latitude 037-19-23 Longitude 0121-45-15  
Status LIC Zone Border Offset +  
Dir Antenna Make CDB Model 00000000017628 Beam tilt N Ref Azimuth 270.0  
Cell Size for Service Analysis 2.0 km/side  
Distance Increments for Longley-Rice Analysis 1.00 km  
2000 Census data selected  
Not full service station  
Maximum height/power limits not checked

Azimuth (Deg)	ERP (kW)	HAAT (m)	74.0 dBu F(50,50) (km)
0.0	0.050	33.0	2.3
45.0	0.050	33.0	2.3
90.0	0.050	33.0	2.3
135.0	0.050	33.0	2.3
180.0	0.000	192.7	1.5
225.0	15.730	264.8	26.7
270.0	56.000	308.0	36.0
315.0	15.730	274.0	27.0

Analysis of current record

Channel	Call	City/State	Application Ref. No.
22	KAXT-CA	SANTA CLARA-SAN JOSE CA	BLTTA -20031010AAT

Result key: 1  
Scenario 1 Affected station 12  
Before Analysis

Results for: 22N CA SANTA CLARA-SAN JOSE BLTTA 20031010AAT LIC

	POPULATION	AREA (sq km)
within Noise Limited Contour	1525124	1157.4
not affected by terrain losses	1506067	1117.5
lost to NTSC IX	450060	375.2
lost to additional IX by ATV	0	0.0
lost to all IX	<b>450060 (29.5%)</b>	375.2

Potential Interfering Stations Included in above Scenario 1

22N CA COTATI	BPET	20040803AAZ	CP
36N CA SAN JOSE	BLCT	19881116KE	LIC

OET-69 Analysis to KAXT-CA [Analog]  
Interference Received Post Transition

KAXT-CA BLTTA -20031010AAT SANTA CLARA-SAN JOSE CA US  
Channel 22 ERP 56. kW HAAT 00999 m RCAMSL 00344 m  
Latitude 037-19-23 Longitude 0121-45-15  
Status LIC Zone Border Offset +  
Dir Antenna Make CDB Model 00000000017628 Beam tilt N Ref Azimuth 270.0  
2000 Census data selected  
Cell Size for Service Analysis 2.0 km/side  
Distance Increments for Longley-Rice Analysis 1.00 km  
Not full service station  
Maximum height/power limits not checked

Azimuth (Deg)	ERP (kW)	HAAT (m)	74.0 dBu F(50,50) (km)
0.0	0.050	33.0	2.3
45.0	0.050	33.0	2.3
90.0	0.050	33.0	2.3
135.0	0.050	33.0	2.3
180.0	0.000	192.7	1.5
225.0	15.730	264.8	26.7
270.0	56.000	308.0	36.0
315.0	15.730	274.0	27.0

Channel	Call	City/State	Application	Ref. No.
22	KAXT-CA	SANTA CLARA-SAN JOSE CA	BLTTA	-20031010AAT

Result key: 2  
Scenario 2 Affected station 13  
Before Analysis

Results for: 22N CA SANTA CLARA-SAN JOSE BLTTA 20031010AAT LIC

	POPULATION	AREA (sq km)
within Noise Limited Contour	1525124	1157.4
not affected by terrain losses	1506067	1117.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	602038	467.0
lost to all IX	<b>602038 (39.5%)</b>	467.0

Potential Interfering Stations Included in above Scenario 2

22A CA SANTA ROSA	BSRCCT	20051130AJX	APP
-------------------	--------	-------------	-----

OET-69 Analysis to KAXT-CA [Digital]  
Interference Received Post Transition  
Using Replication Antenna Pattern

KAXT      USERRECORD-01      SANTA      CA US  
Channel 22 ERP 0.4    kW    HAAT 145. m    RCAMSL 00344 m  
Latitude 037-19-23    Longitude 0121-45-15  
Status APP      Zone 2      Border  
Dir Antenna Make usr    Model 000000000kaxtc    Beam tilt N    Ref Azimuth 270.  
2000 Census data selected  
Cell Size for Service Analysis 2.0 km/side  
Distance Increments for Longley-Rice Analysis 1.00 km  
Not full service station  
Facility meets maximum power limit

Azimuth (Deg)	ERP (kW)	HAAT (m)	51.0 dBu F(50,90) (km)
0.0	0.000	33.0	2.1
45.0	0.000	33.0	2.1
90.0	0.000	33.0	2.1
135.0	0.000	33.0	2.1
180.0	0.000	192.7	1.0
225.0	0.094	264.8	26.6
270.0	0.400	308.0	36.0
315.0	0.094	274.0	27.0

Analysis of current record

Channel	Call	City/State	Application Ref. No.
22	KAXT	SANTA CA	USERRECORD-01

Results for: 22A CA SANTA      USERRECORD01      APP  
HAAT 145.0 m, ATV ERP 0.4 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1524949	1137.5
not affected by terrain losses	1516993	1113.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	386409	339.3
lost to ATV IX only	386409	339.3
lost to all IX	<b>386409 (25.3%)</b>	339.3

Potential Interfering Stations Included in above Scenario      2

22A CA SANTA ROSA	BSRCCT	20051130AJX	APP
-------------------	--------	-------------	-----

Note: Antenna pattern is calculated replication pattern.

TECHNICAL STATEMENT  
RESPONSE TO  
ROUND II POST-TRANSITION CHANNEL SELECTION OBJECTION  
KFTY(TV) SANTA ROSA, CALIFORNIA

OET-69 Analysis to KAXT-CA [Analog]  
On Channel 20 Post Transition

KAXT-CA USERRECORD-01 SANTA CLARA CA US  
Channel 20 ERP 56. kW HAAT 308. m RCAMSL 00344 m  
Latitude 037-19-23 Longitude 0121-45-15  
Status APP Zone 2 Border Offset  
Dir Antenna Make CDB Model 00000000017628 Beam tilt N Ref Azimuth 270.  
Last update Cutoff date Docket  
2000 Census data selected  
Cell Size for Service Analysis 2.0 km/side  
Distance Increments for Longley-Rice Analysis 1.00 km  
Not full service station  
Facility meets maximum power limit

Azimuth (Deg)	ERP (kW)	HAAT (m)	74.0 dBu F(50,50) (km)
0.0	0.050	33.0	2.3
45.0	0.050	33.0	2.3
90.0	0.050	33.0	2.3
135.0	0.050	33.0	2.3
180.0	0.000	192.7	1.5
225.0	15.730	264.8	26.7
270.0	56.000	308.0	36.0
315.0	15.730	274.0	27.0

\*\*\*\*\*

Start of Interference Analysis

Channel	Proposed Station Call	City/State	ARN
20	KAXT-CA	SANTA CLARA CA	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
19	KBWB	SAN FRANCISCO CA	78.0	LIC	BLCDT	-20000421ABF
21	KMAX-TV	SACRAMENTO CA	107.2	LIC	BLCDT	-20041018ABT

%%%

Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
19	KBWB	SAN FRANCISCO CA	BLCDT	-20000421ABF

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
18	KUVS-TV	MODESTO CA	156.7	LIC	BLCDT	-20020906ABH
18	KCSO-DT	MODESTO CA	156.8	PLN	DTVPLN	-DTVP0294
19	KUVS-TV	MODESTO CA	156.7	LIC	BLCT	-20011012ABT

19 KCOY-DT SANTA MARIA CA 375.7 PLN DTVPLN -DTVP0341  
20 KAXT-CA SANTA CLARA CA 78.0 APP USERRECORD-01  
Proposal causes no interference

#####

### Analysis of Interference to Affected Station 2

#### Analysis of current record

Channel	Call	City/State	Application	Ref. No.
21	KMAX-TV	SACRAMENTO CA	BLCDDT	-20041018ABT

#### Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
20	KFTV	HANFORD CA	224.5	LIC	BLCDDT	-20020906ABE
20	KFTV-DT	HANFORD CA	224.4	PLN	DTVPLN	-DTVP0389
20	KCVU	PARADISE CA	189.8	CP	BPCDDT	-19990908AAW
20	KCVU-DT	PARADISE CA	189.6	PLN	DTVPLN	-DTVP0390
20	KCVU	PARADISE CA	189.8	APP	BMPCDDT	-20041026AGI
20	KAME-TV	RENO NV	207.2	APP	BPCDDT	-20040803AAS
20	KAME-TV	RENO NV	207.2	LIC	BLCDDT	-20020528AAY
20	KAME-TV	RENO NV	207.2	LIC	BPRM	-20001017AAA
21	KFTV	HANFORD CA	224.5	LIC	BLCT	-19971110KG
21	KAME-TV	RENO NV	207.2	LIC	BLCT	-19811104KG
22	KRCB	COTATI CA	95.3	CP	BPET	-20040803AAZ
22	KFTY	SANTA ROSA CA	95.3	APP	BSRCCT	-20051130AJX
22	KAME-DT	RENO NV	207.2	PLN	DTVPLN	-DTVP0498
22	KAXT-CA	SANTA CLARA CA	107.2	APP	USERRECORD-01	

Proposal causes no interference

#####

### Analysis of Interference to Affected Station 3

#### Analysis of current record

Channel	Call	City/State	Application	Ref. No.
20	KAXT-CA	SANTA CLARA CA	USERRECORD-01	

Results for: 20N CA SANTA CLARA USERRECORD01 APP

	POPULATION	AREA (sq km)
within Noise Limited Contour	1524837	1169.4
not affected by terrain losses	1505385	1137.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	477	8.0
lost to all IX	477 (<0.1%)	8.0

#### Potential Interfering Stations Included in above Scenario 1

19A CA SAN FRANCISCO	BLCDDT	20000421ABF	LIC
20A CA HANFORD	BLCDDT	20020906ABE	LIC

OET-69 Analysis to KAXT-CA [Analog]  
On Channel 42 Post Transition

KAXT-CA USERRECORD-01 SANTA CLARA CA US  
Channel 42 ERP 56. kW HAAT 308. m RCAMSL 00344 m  
Latitude 037-19-23 Longitude 0121-45-15  
Status APP Zone 2 Border Offset  
Dir Antenna Make CDB Model 00000000017628 Beam tilt N Ref Azimuth 270.  
2000 Census data selected  
Cell Size for Service Analysis 2.0 km/side  
Distance Increments for Longley-Rice Analysis 1.00 km  
Not full service station  
Facility meets maximum power limit

Azimuth (Deg)	ERP (kW)	HAAT (m)	74.0 dBu F(50,50) (km)
0.0	0.050	33.0	2.3
45.0	0.050	33.0	2.3
90.0	0.050	33.0	2.3
135.0	0.050	33.0	2.3
180.0	0.000	192.7	1.5
225.0	15.730	264.8	26.7
270.0	56.000	308.0	36.0
315.0	15.730	274.0	27.0

\*\*\*\*\*

Start of Interference Analysis

Channel	Call	City/State	ARN
42	KAXT-CA	SANTA CLARA CA	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
41	KKPX	SAN JOSE CA	72.3	LIC	BLCDT	-20021108ABD
43	KCSM-TV	SAN MATEO CA	78.0	LIC	BLEDT	-20030822AFZ

%%%

Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
41	KKPX	SAN JOSE CA	BLCDT	-20021108ABD

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
40	KTXL	SACRAMENTO CA	104.1	APP	BFRCT	-20050815AAY
40	KTXL	SACRAMENTO CA	104.1	LIC	BLCT	-19851112KI
42	KAXT-CA	SANTA CLARA CA	72.3	APP	USERRECORD-01	

Proposal causes no interference

#####

Analysis of Interference to Affected Station 2

Analysis of current record

Channel	Call	City/State	Application Ref. No.
43	KCSM-TV	SAN MATEO CA	BLEDT -20030822AFZ

Proposal causes no interference

#####

Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application Ref. No.
42	KAXT-CA	SANTA CLARA CA	USERRECORD-01

Result key: 1  
Scenario 1 Affected station 3  
Before Analysis

Results for: 42N CA SANTA CLARA	USERRECORD01	APP
	POPULATION	AREA (sq km)
within Noise Limited Contour	1475731	985.8
not affected by terrain losses	1472809	965.9
lost to NTSC IX	23364	23.9
lost to additional IX by ATV	458	8.0
lost to all IX	23822 (1.6%)	31.9

Potential Interfering Stations Included in above Scenario 1

42N CA COALINGA	BPTTL	20031001AYK	CP
41A CA SAN JOSE	BLCDT	20021108ABD	LIC

**DECLARATION OF MICHAEL DeCLUE**

I, Michael DeClue, am the Senior Vice President/Technical & Capital Management of Ackerley Broadcasting Operations, LLC, the licensee of television station KFTY, Santa Rosa, California. I hereby declare under penalty of perjury that I have reviewed the foregoing Reply Comments of Ackerley Broadcasting Operations, LLC and that, to the best of my knowledge, information and belief formed after reasonable inquiry, it is well grounded in fact and is warranted by existing law.

  
Michael DeClue

December 14, 2005

**CERTIFICATE OF SERVICE**

I, Wanda L. Thorpe, hereby certify that on December 14, 2005, I caused a copy of the foregoing "Reply Comments of Ackerley Broadcasting Operations, LLC" to be delivered by overnight delivery via UPS Overnight Mail to the following:

Nazifa Sawez\*  
Federal Communications Commission  
445 Twelfth Street, SW, Room 2-A726  
Washington, DC 20554

John J. McVeigh, Esq.  
12101 Blue Paper Trail  
Columbia, MD 21044-2787  
*Counsel for Rural California  
Broadcasting Corporation*

Peter Tannenwald, Esq.  
Irwin, Campbell & Tannenwald, PC  
1730 Rhode Island Avenue, NW  
Suite 200  
Washington, DC 20036-3120  
*Counsel for Broadland Properties  
Inc.*

David D. Oxenford, Esq.  
Pillsbury Winthrop Shaw Pittman LLP  
2300 N Street, NW  
Washington, DC 20037-1128  
*Counsel for Educational Media  
Foundation*

Michael Lazar  
Capital Public Radio, Inc.  
7055 Folsom Blvd.  
Sacramento, CA 95826

Malcolm G. Stevenson, Esq.  
Schwartz, Woods & Miller  
1233 20<sup>th</sup> Street, NW, Suite 610  
Washington, DC 20036-7322  
*Counsel for Northern California  
Educational Television Association*

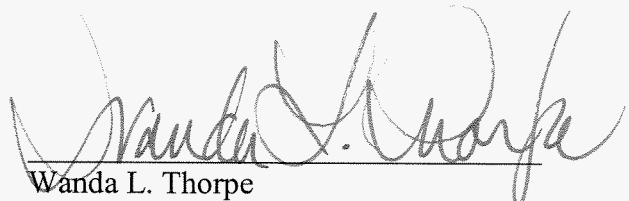
Scott S. Patrick, Esq.  
Dow, Lohnes & Albertson, PLLC  
1200 New Hampshire Avenue, NW  
Suite 800  
Washington, DC 20036  
*Counsel for KTVU Partnership*

Scott R. Flick, Esq.  
Pillsbury Winthrop Shaw Pittman LLP  
2300 N Street, NW  
Washington, DC 20037-1128  
*Counsel for Telefutura Sacramento LLC*

Michael Wall  
KVIE, Inc.  
2595 Capitol Oaks Drive  
Sacramento, CA 95833

Kathleen Victory, Esq.  
Fletcher Heald & Hildreth, PLC  
1300 N. 17<sup>th</sup> Street  
11<sup>th</sup> Floor  
Arlington, VA 22209  
*Counsel for KTNC License, LLC*

Mark J. Prak, Esq.  
Brooks Pierce McLendon Humphrey  
& Leonard, LLP  
1600 Wachovia Capitol Center  
150 Fayetteville Street Mall  
Raleigh, NC 27601  
*Counsel for Young Broadcasting  
of San Francisco, Inc.*

  
Wanda L. Thorpe